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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA, Plaintiff, vs. WILLIAM STEPHEN HAYES, Defendant.	Case No. 2:22mj501 DBP CRIMINAL COMPLAINT VIO: 49 U.S.C. § 46504 [Interference with a Flight Crew] 49 U.S.C. § 46506 and 18 U.S.C. § 113(a)(4) [Assault by Striking, Beating, and Wounding in the Special Aircraft Jurisdiction of The United States] Chief Magistrate Judge Dustin B. Pead
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Before a United States Magistrate Judge for the District of Utah, appeared
the undersigned, who on oath deposes and says:

COUNT 1

49 U.S.C. § 46504
(Interference with a Flight Crew)

On or about July 26, 2022, in the District of Utah and elsewhere,

WILLIAM STEPHEN HAYES,

the Defendant herein, in the special aircraft jurisdiction of the United States as defined in 49 U.S.C. § 46501(2), did assault and intimidate flight attendants and crew members of an aircraft, thereby interfering with the performance of the duties of the flight attendants and crew members and lessening the ability of the flight attendants and crew members to perform those duties, all in violation of and punishable under 49 U.S.C. § 46504.

COUNT 2

18 U.S.C. § 113(a)(4)
(Assault by Striking, Beating, and Wounding)

On or about July 26, 2022, in the District of Utah and elsewhere,

WILLIAM STEPHEN HAYES,

the Defendant herein, did, in the special aircraft jurisdiction of the United States as defined in 49 U.S.C. § 46501(2), commit assault by striking, beating and wounding

E.H.-S., all in violation of 49 U.S.C. § 46506(1) and 18 U.S.C. § 113(a)(4), and punishable thereunder.

* * *

Complainant states that this complaint is based on information obtained through investigation consisting of the following:

I, Kylie Ruiz, being first duly sworn, depose and say:

1. I am a 15-year law enforcement officer and have 13 years' experience as a patrol officer for the Salt Lake City Police Department. I am currently assigned to the Airport Investigations Division and have served with them on multiple occasions over my career. I am also a Deputized Task Force Officer with the Federal Joint Terrorism Task Force and serve as one of two Airport Liaison Agents at the Salt Lake City International Airport. I have taken several investigation courses and completed hundreds of cases resulting in successful convictions both on the patrol and investigations sides. As a federal Task Force Officer, I am authorized to investigate violations of the law of the United States and have authority to execute arrest and search warrants issued under the authority of the United States.

2. The statements in this affidavit are based, in part, on an investigation conducted by myself and/or communicated to me by other law enforcement

officers, other investigators with knowledge of this investigation, and witnesses who observed the incident. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included every fact known to me concerning this investigation. Rather, I have set forth facts sufficient to establish probable cause for the complaint.

3. On or about July 26, 2022, an aircraft was diverted into Salt Lake City International Airport due to an unruly and violent male passenger. The passenger, who was later identified as WILLIAM STEPHEN HAYES, a citizen of the United Kingdom, had to be restrained by flight attendants and passengers due to his actions.

4. Virgin Atlantic Airlines flight #141 originated from London Heathrow Airport in the United Kingdom and was en route to Los Angeles, California, United States of America, when it was determined by the flight Captain and flight attendants to divert to Salt Lake City. Witness statements reported that throughout the flight HAYES was loud, disruptive, threatening and abusive to other passengers and to crew members. Flight attendants opened a restraint kit as a precaution.

5. At one point during the flight, HAYES assaulted a male passenger seated in front of him, grabbing the passenger's shirt, attempting to hit him, and grabbing

his throat. This action left visible marks on the assaulted passenger's neck.

HAYES also spat on and attempted to bite this passenger. HAYES was restrained by the passenger with the assistance of another passenger and crew members, and was placed in handcuffs. While restrained, HAYES continued to fight and be abusive, and attempted to kick the windows of the aircraft.

6. Based on these actions and events, the Captain diverted the flight from its intended non-stop route to Los Angeles and landed on an emergency basis at Salt Lake City International Airport for the safety of the plane, passengers, and crew.

/s/ *Kylie Ruiz*
KYLIE RUIZ
Task Force Officer
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME this _27th day of
July, 2022.



DUSTIN B. PEAD
Chief United States Magistrate Judge

APPROVED:

TRINA A. HIGGINS
UNITED STATES ATTORNEY

/s/ *Michael Kennedy*

MICHAEL KENNEDY
Assistant United States Attorney

